

CHAITMAN LLP

Helen Davis Chaitman
Gregory M. Dexter
465 Park Avenue
New York, New York 10022
(888) 759-1114
hchaitman@chaitmanllp.com
gdexter@chaitmanllp.com

*Attorneys for Defendants listed on Exhibit A to
the Trustee's Motion (ECF No. 17284-1)*

**UNITED STATES BANKRUPTCY COURT
FOR THE SOUTHERN DISTRICT OF NEW YORK**

SECURITIES INVESTOR PROTECTION
CORPORATION,

Plaintiff-Applicant,

v.

BERNARD L. MADOFF INVESTMENT
SECURITIES LLC,

Defendant.

Adv. Pro. No. 08-1789 (SMB)

SIPA LIQUIDATION

(Substantively Consolidated)

In re:

BERNARD L. MADOFF,

Debtor.

IRVING H. PICARD, Trustee for the Liquidation of
Bernard L. Madoff Investment Securities LLC,

Plaintiff,

v.

DEFENDANTS IN ADVERSARY PROCEEDINGS
LISTED ON EXHIBIT A TO THE TRUSTEE'S
MOTION,

Defendants.

Adv. Pro. Nos. listed on Exhibit A
to the Trustee's Motion (ECF No.
17284-1)

DECLARATION OF HELEN DAVIS CHAITMAN

I, Helen Davis Chaitman, hereby declare, under penalty of perjury pursuant to 28 U.S.C. § 1746, as follows:

1. I am a partner with Chaitman LLP, counsel to Defendants represented by Chaitman LLP in the adversary proceedings listed on the Trustee's Exhibit A (the "Defendants") to the Trustee's Motion for an Order Establishing Omnibus Proceeding for the Purpose of Determining the Existence, Duration, and Scope of the Ponzi Scheme at BLMIS. (*See* ECF No. 17284-1).

2. I submit this declaration in support of the Defendants' Sur-Reply.

3. Annexed here to as **Exhibit A** is a true and correct copy of May 1, 2018 emails between Maximillian Shifrin and Helen Davis Chaitman.

4. Annexed here to as **Exhibit B** is a true and correct copy of May 6-7, 2018 emails between Maximillian Shifrin and Helen Davis Chaitman.

5. Annexed here to as **Exhibit C** is a true and correct copy of June 19, 2018 email from Helen Davis Chaitman to Maximillian Shifrin.

July 23, 2018

/s/ Helen Davis Chaitman
Helen Davis Chaitman

CERTIFICATE OF SERVICE

I hereby certify that on July 23, 2018, I caused a true and correct copy of the foregoing document to be served upon the parties in this action who receive electronic service through CM/ECF and by electronic mail upon:

BAKER & HOSTETLER LLP

45 Rockefeller Plaza
New York, New York 10111
Telephone: 212.589.4200
Facsimile: 212.589.4201
David J. Sheehan, Esq.
Email: dsheehan@bakerlaw.com

SECURITIES INVESTOR PROTECTION CORPORATION

1667 K Street NW, Suite 1000
Washington, D.C. 20006
Telephone: 202.371.8300
Facsimile: 202.223.1679
Kevin H. Bell, Esq.
Email: kbell@sipc.org

*Attorneys for Irving H. Picard, Trustee for the
Substantively Consolidated SIPA Liquidation
of Bernard L. Madoff Investment Securities
LLC and the Estate of Bernard L. Madoff*

CHAITMAN LLP

By: /s/ Helen Davis Chaitman
465 Park Avenue
New York, NY 10022
Phone & Fax: 888-759-1114
hchaitman@chaitmanllp.com

Attorneys for the Defendants